

GENERAL DYNAMICS

Electric Boat

Jeffrey S. Geiger

President

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U.S. Environmental Protection Agency
New England Region
5 Post Office Square, Suite 100
Mail Code: OEP06-1
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To Whom It May Concern:

I am writing this letter to express General Dynamics Electric Boat's support for the EPA's proposed rule – released on April 27, 2016 – to designate a new dredged-material disposal site in Long Island Sound.

Electric Boat's shipyard is located on the Thames River in Connecticut, downstream of the Naval Submarine Base. Electric Boat has built submarines for the U.S. Navy for more than 100 years, and is the only shipyard in the United States focused primarily on building submarines. We currently employ more than 10,400 people in our Groton and New London, CT, locations.

A significant part of Electric Boat's operations depends on the water-depth maintenance that dredging provides. Electric Boat relies on deep-water access for delivery of construction materials and submarine modules to the shipyard, transit of submarines for maintenance and modernization, and for final ship delivery to the Navy. As a result, the existence of a sufficient and cost-effective dredging disposal option is vital to Electric Boat's mission.

The proposed Eastern Long Island Sound Disposal Site (ELDS) is close to Electric Boat's facilities and is economically critical to the region. Navigation-dependent activity in the Long Island Sound contributes about \$9.4 billion annually to the region. This figure includes Electric Boat's shipbuilding work in Connecticut and Rhode Island, which is expected to grow significantly in the next 10 years.

U.S. Representative Joe Courtney also endorses the proposed EPA rule, and has noted that the failure to have access to the ELDS would force the transportation of dredged materials to the Central Long Island Sound Disposal Site or the Rhode Island Disposal Site, which would be environmentally detrimental due to greater energy use, increased air emissions, and increased risk of spills and short dumps.

To sum up, Electric Boat strongly supports the EPA's proposed rule for the Eastern Long Island Sound Disposal Site. The proposal supports a national defense requirement, is economically important for the region, and is environmentally friendly.

Sincerely,



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